

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ROME DIVISION

IN RE: DUSTIN TYLER BABB,	{ CHAPTER 13
	{
	{
DEBTOR	{ CASE NO. R24-40714-BEM
	{
	{ JUDGE ELLIS-MONRO

SUPPLEMENTAL OBJECTION TO CONFIRMATION

COMES NOW K. EDWARD SAFIR, CHAPTER 13 TRUSTEE herein, and objects to Confirmation of the plan for the following reasons:

1. The Chapter 13 petition fails to include a debt owed to the U.S. Department of Housing and Urban Development, in violation of Bankruptcy Rule 1007(a)(1) and 11 U.S.C. Section 1325(a)(3).

2. The proposed plan fails to provide for the treatment of the U.S. Department of Housing and Urban Development. However, said creditor has filed a secured claim.

WHEREFORE, the Trustee moves the Court to inquire into the above objections, deny Confirmation of this Debtor's Plan and to dismiss the case; or, in the alternative, convert the case to one under Chapter 7.

/s/
Sonya Buckley Gordon, Attorney
for Chapter 13 Trustee
GA Bar No. 140987

K. Edward Safir, Chapter 13 Trustee
285 Peachtree Center Ave., NE
Suite 1600
Atlanta, GA 30303
(404) 525-1110
sonyab@atlch13tt.com

R24-40714-BEM

CERTIFICATE OF SERVICE

I hereby certify that on this day I electronically filed the foregoing pleading using the Bankruptcy Court's Electronic Case Filing program, which sends a notice of this document and an accompanying link to this document to the following parties who have appeared in this case under the Bankruptcy Court's Electronic Case Filing program:

SAEGER & ASSOCIATES, LLC

I further certify that on this day I caused a copy of this document to be served via first-class United States mail, postage prepaid, on the following parties at the address shown for each:

DUSTIN TYLER BABB
4580 HIGHWAY 52A
CHATSWORTH, GA 30705-7718

This 9th day of July, 2024

Respectfully submitted,

/s/
Sonya Buckley Gordon, Attorney
for Chapter 13 Trustee
GA Bar No. 140987

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